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ATTN: Harbor Comments  
Ms. Gina McCarthy, Administrator  
U.S. Environmental Protection Agency  
805 SW Broadway, Suite 500  
Portland, OR 97205  
Email: [harborcomments@epa.gov](mailto:harborcomments@epa.gov)

RECEIVED  
OREGON OPERATIONS OFFICE

AUG 17 2016

EPA-REGION 10

**Re: Portland Harbor Superfund Cleanup**

Dear Ms. McCarthy:

This letter expresses the East Multnomah Soil and Water Conservation District's (EMSWCD's) position regarding the Environmental Protection Agency's (EPA's) preferred alternative for the Portland Harbor Superfund Cleanup.

The EMSWCD is a local, non-regulatory government agency that works east of the Willamette River centerline in Multnomah County to help people care for land and water. To accomplish our mission, we implement several programs with a diverse set of partners. In the urban areas of our district—which includes the eastside of the Willamette River within Multnomah County and North, Northeast, and Southeast Portland—we work with residents, community organizations, and government agencies to improve water quality in local streams and rivers, reduce domestic water use, improve and protect natural habitats, and provide people with access to nature.

***The EPA's preferred alternative to clean up the Portland Harbor Superfund Site runs counter to our mission and our programs as it falls far short of what is necessary to improve the conditions of the river to safeguard the health of people and fauna. Additionally, as many of the local residents and river users within this area are from the most economically-challenged, racially diverse, and historically under-served communities within Oregon, the EPA's preferred alternative is an indefensible continuation of environmental injustice that these communities have faced for decades. For these reasons, the EPA's preferred alternative is unacceptable.***

Given the above, the EPA must not implement Alternative I of the proposed cleanup plan, but instead must implement an aggressive cleanup of the site that:

1. Ensures contaminants causing harm to Willamette and Columbia river resources are reduced to the maximum extent possible as quickly as possible;
2. Ensures contamination from the site no longer contributes to making any amount of fish or other fauna unsafe to eat for anyone, including children, the elderly, and people with compromised immune systems;
3. Ensures contamination from the site no longer contributes to exposing people to any health risks through contact with sediments, water, or airborne agents;
4. Includes ongoing monitoring and cleanup of the river upstream and downstream from the site; and
5. Holds polluters (not the public) 100% accountable for cleaning up the site.



Relying on enhanced natural recovery, monitored natural recovery, and signage for nearly 90% of the contaminated area is a 90% failure on EPA's behalf.

If you have questions or would like to discuss, please do not hesitate to contact Jay Udelhoven, EMSWCD Executive Director, at 503-935-5352.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Guebert". The signature is fluid and cursive, with the first name "Mike" being more legible than the last name "Guebert".

Mike Guebert  
Chair, EMSWCD Board of Directors

cc: City of Portland Mayor  
Board of Multnomah County Commissioners  
Metro Council  
Portland City Council  
Oregon Governor Kate Brown  
Oregon State Senate Committee on Environment and Natural Resources  
Oregon State House Committees on Agriculture and Natural Resources, and Energy and Environment  
Oregon U.S. Senators and Representatives  
West Multnomah Soil & Water Conservation District